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October 11, 2022

VIA EMAIL & ECF

The Honorable Diane Gujarati
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

RE: United States v. Jia Liu, No. 22-cr-70 (DG)

Dear Judge Gujarati:

I write on behalf of defendant Jia Liu to request an additional five days to file our motion to suppress, which is due on October 14, 2022. I make this request for personal reasons. Over the Columbus Day weekend, my children (ages 3 and 1) both became sick with fevers, which my daughter continues to have. I have had to stay home with them (and may have to continue doing so through tomorrow), which has resulted in my losing a significant portion of the time I had set aside to write the motion.

So that I have the time I need to complete the motion, I am requesting that the briefing schedule be extended five days. If granted, our motion would be due October 19, 2022; the government's response would be due November 2, 2022; and any reply would be due November 9, 2022.

I have conferred with counsel for the government, who consents to this request. I thank the Court in advance for its attention and consideration.

Respectfully submitted,

/s/
Benjamin Yaster
Federal Defenders of New York, Inc.
(718) 330-1291
Counsel for Jia Liu

cc: Adam Amir, AUSA (via ECF)